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White Plains, NY
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April 14, 2025

Via ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Ex Parte Application for an Order to Take Discovery for Use in a Foreign Proceeding Pursuant to 28 U.S.C. 1782*,
No. 1:25-mc-00096 (S.D.N.Y. March 10, 2025)

Dear Judge Rochon –

We represent Petitioner Adriana Embiricos Coumoundouros in the above-referenced action in which Petitioner has filed an application pursuant to 28 U.S.C. § 1782 for an order authorizing her to take discovery for use in a foreign proceeding (the “Application”). We write pursuant to Rule 1(F) of Your Honor’s Individual Rules of Practice in Civil Cases to respectfully request a two-week extension of Petitioner’s April 17, 2025 deadline to reply to Nitzia Logothetis’ opposition to the Application. (ECF No. 9.)

Petitioner filed the Application on March 10, 2025. It included a nine-page memorandum of law. The Court’s March 13, 2025 Order granted Ms. Logothetis’s request for a one-month period (until April 10, 2025) to file an “opposition” to the Application. It also ordered that Petitioner’s reply be due a week later, on April 17, 2025. Ms. Logothetis filed her papers on April 10, 2025, which are styled as both an opposition and a new “motion to intervene” (the “Motion and Opposition”) and include a 24-page memorandum of law, a 20-page expert declaration and 8 new exhibits. (ECF Nos. 14-17.)

In light of the fact that Ms. Logothetis has filed a lengthy new motion in addition to an opposition, and in view of the Passover holiday, which is observed by the undersigned and the Panama law expert retained in this matter, Petitioner respectfully submits that a brief two-week extension of time to submit her reply, from April 17, 2025, to May 1, 2025, is warranted. This is Petitioner’s first request for an extension of this deadline.

Ms. Logothetis consents to the extension requested herein.

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We thank the Court for its consideration of this request.

Respectfully submitted,

YANKWITT LLP

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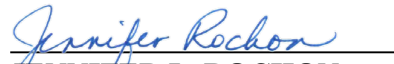
Attorney for Petitioner
Adriana Embiricos Coumoundouros

cc: All counsel (via ECF)

Petitioner's request for an extension is granted. Plaintiff shall have until May 1, 2025 to file her reply to Ms. Logothetis's opposition to the Application.

SO ORDERED.

Dated: April 15, 2025
New York, New York


JENNIFER L. ROCHON
United States District Judge